

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DEMOCRATIC NATIONAL COMMITTEE,
et al.

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE,
et al.

Defendants.

Civil Action No.: 81-3876 (JMV)(JBC)

**SECOND DECLARATION OF
MICHAEL LIEBERMAN, ESQ.**

Pursuant to 28 U.S.C. § 1746, I, Michael Lieberman, declare as follows:

1. My name is Michael Lieberman. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am a U.S. Citizen, and a resident of San Francisco, California, where I serve as a judge pro tem on San Francisco's Superior Court. I have been a practicing attorney since 1985 and also have my own private civil litigation practice. I am also barred in Nevada.

3. I have been volunteering as a poll observer for the Democratic Party in Nevada for approximately ten days. Today, November 4, 2016, I am volunteering as a poll observer at the Doolittle Community Center in Northern Las Vegas. This area is heavily African American, and approximately 95% of the voters I have seen today are African American. Throughout the day, there have been three to four poll observers here who have identified themselves as Republican. In the ten days that I have been observing the polls I have never seen this many Republican observers at any of the other polling locations where I was observing. Typically,

there is only one Republican observer at a time if any. None of the other locations that I observed at were heavily African American.

4. While observing at the Doolittle Community Center I met another observer named Victor Santiago. When Mr. Santiago first introduced himself to me he said that he was an observer for the Trump Campaign. Around 1:30 p.m. PST, Mr. Santiago asked me, “[h]ave you read about the lawsuit that the DNC filed?” I told him, “yes,” I had read about the lawsuit. He then told me, “[b]ecause of that we’ve been told we can’t say that we are with the RNC anymore, or even the state Republican Party. We’re supposed to say we are with the Trump Campaign.” I responded by asking him if everything was being coordinated by the RNC. He said, “of course.”

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael Lieberman', is written over a horizontal line.

Michael Lieberman